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# ***OAR Box 1246***

*Prepped by Ollie Stewart*

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*Document Number:*

**3) Consumer Letters**

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*Docket Number:*

**A-90-16**



Barbara Novak

October 26, 1990

portraits of houses • pen & ink • watercolor • acrylic • oil

EPA Administrator William K. Reilly  
Washington, DC 20460

Dear Mr. Reilly:

Recently I read about possible adverse  
and damaging toxic effects from the use of  
manganese additives in gasoline.

I wish to state my firm opposition  
to any such use and strongly urge the  
EPA to reject any application for use of  
manganese as a gasoline additive in the U.S.

Sincerely,

Barbara Novak

200C-1-30-VII-1-P

P.3  
6 Pierrepont Avenue  
Middlesex, NJ 08846

October 29, 1990

Mr. William K. Reilly  
Administrator  
Environmental Protection Agency  
401 M Street, S.W.  
Washington, DC 20460

Dear Mr. Reilly

Please do not approve the use and distribution of HiTec 3000, the gasoline additive produced by the Ethyl Corporation.

As a soon to be parent, I feel it would be in the best interest of my children and my community to avoid such chemicals in the environment. It is bad enough now, knowing the pollution that gasoline in its present state causes. To approve this additive, HiTec 3000, would only add to the many existing environmental problems we are fighting so hard to clean up.

Thank you for your attention to this issue, and I

hope you will see this as I do. Living in a cleaner environment has to be better than living in a dirtier one!

Sincerely,

Kimberli A. Singer

John Singer

NOV 2 10:38

RECEIVED  
EPA  
CORR. CONTROL



# A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won



ELLEN K. SILBERGELD

removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

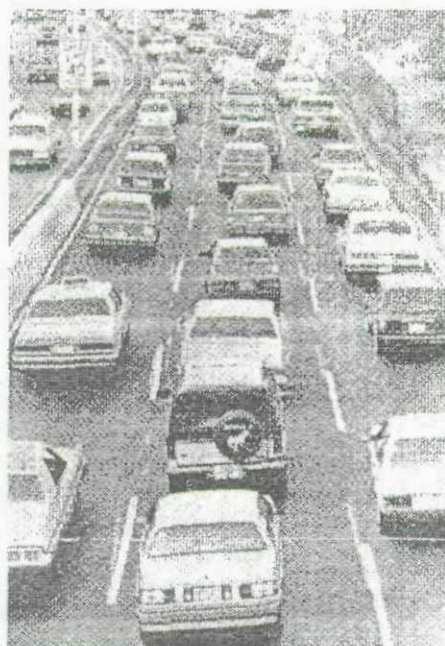
Lead poisoning is an epidemic in the U.S. Even after considerable reductions

*Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.*

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



*With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.*

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor—more important—any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But *both what we know and what we do not know* about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do *not* know what the long-term chronic, low-dose effects of human exposure to manganese are. We do *not* know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do *not* know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer-causing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

*Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.*

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

## EDF MEMBER ACTION ALERT

Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.

To EDF Member: Mr. Edward S. Selig  
180 Glenbrook Rd #39  
STAMFORD CT 06902-3027

Membership No: 03372887  
ABFW5A

*E. Selig*

Dear Mr. Selig:

I am inviting you -- as one of a select group of EDF's most active members -- to sign our "Open Letter to the EPA" . . . urging that EPA deny the Ethyl Corporation's application for "HiTec 3000," a toxic manganese-based gasoline additive.

I need to receive your answer by October 29 to meet the advertising deadline. Please respond immediately.

*Fred Bruz*

- ☐ YES, Fred, I accept your invitation to sign on to EDF's Open Letter advertisement protesting Ethyl Corporation's "HiTec 3000" proposal, which would release large quantities of manganese into the environment.

I am enclosing the following tax-deductible gift to support the cost of the ad as well as EDF's scientific work on this critical manganese campaign and other efforts to protect the environment:

☐ \$100      ☐ \$50      \* ☐ \$35      ☐ \$20

\*A gift at this level or higher will move your name to a more prominent position in the ad under the banner "Member Leadership Committee on Manganese."

Your name will appear as follows: Mr. Edward S. Selig  
(make any corrections needed)

The ad will include the Open Letter (below), the names of all participating members, and added technical information on the issue -- see the other side of this page for an advance EDF LETTER column on Ethyl Corporation's proposal.

(This advertisement paid for by the undersigned members of the Environmental Defense Fund)

OPEN LETTER TO WILLIAM K. REILLY  
ADMINISTRATOR, UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a toxic manganese-based gasoline additive.

Sincerely,

*E. Selig*

The Undersigned Members of the  
Environmental Defense Fund

- ☐ I would prefer not to sign on to this advertisement but I would like to make the following tax-deductible gift in support of EDF's efforts:

\$ \_\_\_\_\_

Administrator William K. Reilly  
Environmental Protection Agency  
401 M. Street, SW  
Washington, D.C. 20460

Dear Administrator Reilly,

As concerned citizens of the United States against environmental pollution and endangerment of the American populace by irresponsible corporations, we strongly urge you to deny Ethyl Corporation's application for "Hi-Tec 3000," a toxic manganese-based gasoline additive.

Sincerely,

The Undersigned

Name	Address
1. John C. Reed	5510 Redcoat, Kalamazoo, MI 49009 (616) 375-2109
2. Steven C. Kels	5510 Redcoat Lane, Kalamazoo, MI 49009
3. Clara W. Sage	10469 Oakland Dr. Kalamazoo MI. 4
4. Anne Yorkman	1423 Henson Kal. MI 49001
5. Freding Brundley	10346 East R. Ave South Mich 49088
6. Georgia Duncan	1420 North Park Street 49007
7. Dawn Bishop	1808 Jack Court Kalamazoo, MI 49007
8. Arlene Massey	1408 Humphrey Kal. MI 49001
9. Mary E. Whitaker	2256 N. 20th St. Kalamazoo, MI (49009)
10. Rosalie Stamp	2321 Beethoven Portage MI 49002
11. Ronnie Meters	6723 Picadilly Dr. Kal. MI. 49001
12. Scott Herrick	122 Crescent Dr. Kal. MI 49001
13. Bill Jackson	1005 Arthur Ave Kal. MI 49001
14. Paul Woodford	8658 Greenwood Kal. MI 49009
15. Judith D. Whitaker	2837 Elwood Grandville 49418
16. Carla Richards	508 Stockbridge Kalamazoo MI. 49001
17. Linda Harrison	2718 Cornet St. Kalamazoo, MI 49004
18. Dan B. Cam	602 William H. Jensen Portage MI 49002
19. James B. Lee	14172 St. John East. Mich 48823
20. John B. Wayne	1612 W. North St. Kalamazoo, MI 49007

10:10



Administrator William K. Reilly  
Environmental Protection Agency  
401 M. Street, SW  
Washington, D.C. 20460

Dear Administrator Reilly,

As concerned citizens of the United States against environmental pollution and endangerment of the American populace by irresponsible corporations, we strongly urge you to deny Ethyl Corporation's application for "Hi-Tec 3000," a toxic manganese-based gasoline additive.

Sincerely,

The Undersigned

<u>Name</u>	<u>Address</u>
1. Lois Kyle	5246 Mt. Olivet Kal mi 49004
2. Nth. [unclear]	P.O. Box 211 [unclear] MI 49077
3. Charles Peterson	4305 E. Millham Portage MI 49002
4. David Walls	8760 Gall Rd Richland MI 49003
5. Barry Sandford	10031 Woodlawn Dr Kalamazoo MI 49002
6. [unclear]	7415 Skyline Kalamazoo MI 49007
7. [unclear]	1129 [unclear] Kal. MI
8. Connie Pearson	6101 35th St Galesburg 49053
9. Dennis Coe	447 Jambax Kalamazoo MI 49001
10. Hope Nayman	1714 Sunnyside Kalamazoo MI 49001
11. [unclear]	1516 Nazareth Rd #A Kal MI 49001
12. [unclear]	701 CAC/Alt B, MI 49001
13. Kimberly Hart	1516 Nazareth Rd #A Kal MI 49001
14. Sarah E. Bush	947 Vassar Dr Kal. mi 49001
15. Betty Jarrey	11647 Miller Rd Gales. mich 49053
16. Linda Wolf	13800 Tremblay Vicksburg MI 4909
17. [unclear]	293 Lodge Lane Kal MI 49004
18. FARRAINE RATTLE	5283 Collingwood Dr. 49004
19. Anita [unclear]	3317 Mt. Olivet Kal 49004
20. Steve C. Bodul	14550 Lakeshore Rd Hickory Corners, MI 49060



Administrator William K. Reilly,  
Environmental Protection Agency  
401 M. Street, SW  
Washington, D.C. 20460

Dear Administrator Reilly,

As concerned citizens of the United States against environmental pollution and endangerment of the American populace by irresponsible corporations, we strongly urge you to deny Ethyl Corporation's application for "Hi-Tec 3000," a toxic manganese-based gasoline additive.

Sincerely,

The Undersigned

	Name	Address	
1.	Sharon VanderKok	3605 Stewart Dr. Kalamazoo, MI	49006
2.	Mary Kocis	10195 N. Vanal, Okemos, MI	49078
3.	Steven Perez	8614 Shirley Ct., Portage, MI	49002
4.	Mildred Williams	813 Elizabeth Kal MI	49007
5.	Pat Luna	9530 mile Plainwell Mich	49080
6.	Richard W Egan	10469 Oakland Dr. #1 Kalamazoo MI	49002
7.	Bruce Shaler	5042 N. Meadridge, Kal, MI	49007
8.	Sandy Sisk	6380 Newport, Kal. MI	49004
9.	Martha Morris	1608 Park Ave Kalamazoo, MI	49001
10.	Francis Hogan	1679 Cotherman Rd Elvers, MI	49093
11.	Ronald Gustafson	36551 23rd St. Kalamazoo, MI	49009
12.	Bruce Ball	1743 Glendale Kalamazoo, MI	49004
13.	Glady Jones	618 Florence St Kal MI	49007
14.	James R. [Signature]	5856 Richman Dr Richland MI	49083
15.	Karen Bruner	2521 Glendale Kalamazoo, Michigan	49004-1728
16.	Jack Heard	5478 Parkview Kalamazoo, MI	49009
17.	Christy Berninale	1928 Ryer Kalamazoo, MI	49001
18.	Mike Jensen	2421 Holly Portage, MI	49002
19.	[Signature]	1222 [Signature] Plainwell	49080
20.	Daniel Mann	2710 Chappard Kalamazoo,	49007

Administrator William K. Reilly  
Environmental Protection Agency  
401 M. Street, SW  
Washington, D.C. 20460

Dear Administrator Reilly,

As concerned citizens of the United States against environmental pollution and endangerment of the American populace by irresponsible corporations, we strongly urge you to deny Ethyl Corporation's application for "Hi-Tec 3000," a toxic manganese-based gasoline additive.

Sincerely,

The Undersigned

<u>Name</u>	<u>Address</u>
1. <u>Diane Simon</u>	<u>7400 S. W. 11th St. Delton</u>
2. <u>Edward J. Koff</u>	<u>70 Grove St. Galeburg</u>
3. <u>Stephen M. Dyle</u>	<u>CR 215 Grand Junction MI 49056</u>
4. <u>Barbara A. Reinbold</u>	<u>13568 32nd St. Lapeer, MI 49055</u>
5. <u>Marett W. Wise</u>	<u>222 Normal Ct Kal. Mich 49001</u>
6. <u>Joseph N. Wise</u>	<u>822 Normal Ct Kal. Mich 49001</u>
7. <u>Marretta A. Fricko</u>	<u>Mattawan Mich</u>
8. <u>Herbert N. Fricko</u>	<u>Mattawan Mich</u>
9. <u>Lucenna L. Palmer</u>	<u>Kal. Mich.</u>
10. <u>Jerome Palmer</u>	<u>Kal. Mich.</u>
11. <u>Red Allen Wise</u>	<u>Kal. Mich.</u>
12. <u>Larry D. Wise</u>	<u>Kal. Mich.</u>
13. <u>Michael F. Hennamy</u>	<u>Delton Mich</u>
14. <u>Mary Hennamy</u>	<u>Delton Mich</u>
15. <u>Terry L. Hennamy</u>	<u>123 N. Dixie Ave Kal. Mich.</u>
16. <u>Ingelene J. Bostie</u>	<u>3681 Ken Brook Ct.</u>
17. <u>Rudolph</u>	<u>1783 106th Ave. Otsego, Mich 49078</u>
18. <u>Laurette Dean</u>	<u>1303 Hillcrest Kalamazoo</u>
19. <u>Karla Dean</u>	<u>6399 Norius Rd. Delton, Mich 49046</u>
20. <u>Libby Henson</u>	<u>49 Hastings Delton, Mich 49053</u>

Administrator William K. Reilly  
Environmental Protection Agency  
401 M. Street, SW  
Washington, D.C. 20460

Dear Administrator Reilly,

As concerned citizens of the United States against environmental pollution and endangerment of the American populace by irresponsible corporations, we strongly urge you to deny Ethyl Corporation's application for "Hi-Tec 3000," a toxic manganese-based gasoline additive.

Sincerely,

The Undersigned

Name	Address
1. Bruce Fitch	319 W. Walnut Kalamazoo, MI 49007-5130
2. John C. Johnson	604 Pasmaare Passage, MI 49002
3. Debra Coulton	1510 OJEDA TRAILS 49007
4. Scott Fitch	508 Stockbridge Kalamazoo MI 49001
5. Linda Hanch	6699 East L Kal. MI 49001
6. Dave L. Harnall	9133 East ML Ave. Kalamazoo MI 49003
7. Linda Thomas	50347 CR652 Mallowan, MI 49071-9761
8. Nancy Kich	3420 Kewwood, Kalamazoo MI 49002
9. Clemmie Quinn	816 Newgate Kal. MI 49007
10. Karel Asbury	1994 W.C Avenue Kalamazoo MI 49007
11. Stacy Williams	1503 Carter 49001
12. Rita Wadley	1710 East H Ave Kal. MI 49004
13. Katherine S. Dennany	204 Dixie Ave Kal. Mich 49001
14. Carl L. Dennany	204 Dixie Ave Kal. Mich 49001
15. Virginia M. Dennany	123 Dixie Ave Kal. Mich 49001
16. Sally A. Dennany	123 Dixie Ave Kal. Mich 49001
17. Daniel D. Dennany	135 Dixie Ave Kal Mich 49001
18. Marilyn Dennany	135 Dixie Ave Kal Mich 49001
19. Marie Vickens	5507 Redcoat Lane Kal Mich 49008
20. Judy Brown	1451 Banbury Kalamazoo MI 49001

Administrator William K. Reilly,  
Environmental Protection Agency  
401 M. Street, SW  
Washington, D.C. 20460

Dear Administrator Reilly,

As concerned citizens of the United States against environmental pollution and endangerment of the American populace by irresponsible corporations, we strongly urge you to deny Ethyl Corporation's application for "Hi-Tec 3000," a toxic manganese-based gasoline additive.

Sincerely,

The Undersigned

- |     | <u>Name</u>              | <u>Address</u>   |
|-----|--------------------------|--|
| 1.  | Carlos Willhite          | 1510 Ojibwa Trail  |
| 2.  | Alesia Saunders          | 2605 Henthredown   |
| 3.  | Yvonne/Ruffin            | 301 Phelps   |
| 4.  | TAMARA HARTON            | 734 Stickbridge  |
| 5.  | Johnny Willhite          | 510 Ojibwa Trail   |
| 6.  | Shelby Ambz              | 6625 Peyton Pl   |
| 7.  | James E. Talle           | 1754-108th Otsego, MI 49078                              |
| 8.  | Joseph W. Talle (Golden) | 1754 108th Ave. OTSEGO, MI 49078 <sup>616 694-5538</sup> |
| 9.  | Shannon Canute           | 425 Hammond, Otsego, MI 49078                            |
| 10. | Randy Canute             | 425 Hammond Otsego, MI 49078                             |
| 11. | Madeline Reed            | 9580 Marsh Rd, Plainwell, MI 49080                       |
| 12. | Freida Munton            | 1754 108th, Otsego, MI 49078                             |
| 13. | Alvin Brewer             | 175 112th Ave. Plainwell, MI 49080                       |
| 14. | Sandy Arant              | 6868 Demison Road Martin, MI 49070                       |
| 15. | Glen Reed                | 6868 Demison Road Martin, MI 49070                       |
| 16. | Clarence Reed            | 9580 Marsh Rd. Plainwell MI 49080                        |
| 17. | Erin Reed                | 9580 Marsh Rd. Plainwell, MI 49080                       |
| 18. | Jessamine Mailker        | 311 Woodward Ave Kalamazoo MI 49001                      |
| 19. | Patricia Taylor          | 819 Porter Kalamazoo MI 49001                            |
| 20. | El Victor Taylor         | 819 Porter Kalamazoo MI 49001                            |

Administrator William K. Reilly  
Environmental Protection Agency  
401 M. Street, SW  
Washington, D.C. 20460

Dear Administrator Reilly,

As concerned citizens of the United States against environmental pollution and endangerment of the American populace by irresponsible corporations, we strongly urge you to deny Ethyl Corporation's application for "Hi-Tec 3000," a toxic manganese-based gasoline additive.

Sincerely,

The Undersigned

- | Name                  | Address                                    |
|-----------------------|--|
| 1. Nancy Peters       | 11366 E. Shore Delton Mich 49046           |
| 2. Mary Hargrave      | 13042 N. 27th Ave. Okemos, Mich. 49055     |
| 3. Maria Horn         | P.O. Box 641 Galveston Mich 49053          |
| 4. Hazel Bee          | 5162 Sharon Kalamazoo, mi 49008            |
| 5. John Harkin        | 51618 23rd St. Mithcan MI 49001            |
| 6. Kathleen Bass      | 1813 Portage St Kalamazoo MI 49001         |
| 7. Susan Lacey        | 7617 Durban Kalamazoo MI 49001             |
| 8. Eric Payer         | 1000 East O Ave Vicksburg, MI 49087        |
| 9. David White        | 1131 HOTOP AVE. SpA. MI 49001              |
| 10. Julie Steining    | 5857 S. 6th Kalamazoo MI 49009             |
| 11. Margaret Whitnick | 3214 Alpine Hpt. MI 49004                  |
| 12. Beverly B. Spoor  | 3505 Ashland Ave Kal MI 49004              |
| 13. Jeffrey D. Ford   | 5563 Scituate Ave Kal MI 49001             |
| 14. John T. Webster   | 2011 Bank Drive Kal. MI 49004              |
| 15. Fred Van der Wer  | 3455 E. Ave E Kal                          |
| 16. Don Trump         | 3333 Bull Rd K-200 MI 49001                |
| 17. John D. Dwyer     | 532 Maplewood, Galesburg MI                |
| 18. Jack East         | 6468 W. Q Ave. KAL. Mich.                  |
| 19. John F. Dwyer     | 719 Whitcomb Kal MI 49008                  |
| 20. Kate Clark        | 462 Turner Blvd Circle Portage, Mich 49002 |

Dear Mr. Reilly,

I am writing this letter in protest of Ethyl Corporations effort to have its additive "Hitec 3000" approved for use. As a Environmental Engineer with a strong chemistry background I am particularly concerned with adding another heavy metal toxin to our environment. Please refuse their application.

Wayne D. Kant  
5 S. Dave St.  
Albany, NY 12202

Sincerely,

Wayne D. Kant

Senior Design Engineer EG&G Rotron

11-1-90



1119 Cresthaven Drive  
Silver Spring, Maryland  
October 31, 1990

William K. Reilly, Administrator  
U.S. Environmental Protective Agency  
Washington, D.C.

Dear Mr. Reilly:

I urge you to rule against the ETHYL Corporation's application for approval of the gasoline additive "HITEC 3000", a Manganese-based product.

Manganese is toxic. The health risks of the long term, cumulative, effects of its release into the environment outweigh any minor, short term, benefit it may provide.

Sincerely,

*C.B. Talley*

C.B. Talley

Judy Guyon  
943 Frazier  
Santa Rosa, CA 95404

William K. Reilly  
Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460

28 October 90

Dear Mr. Reilly,

Just a brief note:

DO NOT ALLOW THE APPROVAL OF Hi Tec 3000!!

The credibility of the Bush administration is suffering terribly these days, and bowing to Ethyl Corporation's misrepresentation of HiTec 3000 as safe and environmentally beneficial will further compromise its credibility.

HiTec 3000 is not safe, just as lead was not safe as a gasoline additive. It contains manganese, only one of whose complications are Parkinson symptoms.

There are lots of things we can do as a country to improve energy efficiency and safety. HiTec 3000 is not one of these things.

Don't put us at risk! Don't approve HiTec 3000.

Respectfully,

*Judy Guyon*

ADVANCED  
MACHINERY  
IMPORTS LTD

P.O. Box 312  
New Castle, DE 19720

Phone 302 • 322 • 2226  
Fax 302 • 322 • 3479

November 2, 1990

Mr. William K. Reilly  
EPA Administrator  
Washington, DC 20460

Dear Mr. Reilly:

Ethyl Corporation's application for use of MMT in motor fuels have come to my attention. I urge you to consider the long term effects of this product before making a decision on this application.

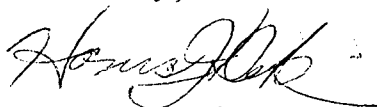
While productivity and progress are part of our culture and the foundation of this country, the failure to address environmental consequences has severely comprised the quality of our environment and the quality of life for every American citizen. Only by including the costs of correcting environmental harm brought about by a product can we bring about permanent solutions to the problems we have created.

If Ethyl's application is to be approved, a trust fund should be established, funded by a percentage of Ethyl Corporation's revenues, whose sole purpose would be to fund environmental studies and clean-up efforts and developments necessitated by their products. Working together with organizations like the Environmental Defense Fund, it should certainly be possible to sufficiently oversee an otherwise potentially irresponsible corporate citizen.

In a word, I support the policy that each of us must be responsible for our actions, and for the consequences of those actions. If Ethyl Corporation wishes to introduce a new and potentially deadly pollutant into the environment we all share, then Ethyl Corporation must also be made responsible for correcting the harm this product will do.

In the past, some have felt it was the role of government to correct the problems that industry produces. This, however, lays an unfair burden on the taxpayer who is forced to finance these activities, while the polluter is free to profiteer from his irresponsible behavior. Only by forcing the producer to be responsible for his activities can we maintain a true market economy without compromising the future of humanity.

Sincerely,

  
Hanns J. Derke

.....  
Your Source For  
**HEGNER** Precision Scroll Saws  
**FELDER** Woodworking Systems  
**HEGNER** Lathe Duplicators  
**PLANO** Glue Press  
**HEGNER** Wood Lathes

William K. Reilly  
EPA Administrator  
Washington, DC

Oct 30, 1990

Dear Mr. Reilly,

I ask you to consider the Ethyl Corporation's record of lies, distortions, and propagandizing, and reject their inappropriate application to sell methylcyclopentadienyl manganese tricarbonyl in gasoline. There are plenty of octane boosters available already. Our farmers can make all the ethanol, for example, that we'll ever need. We do not need to experiment with manganese and its oxides. Please say no to MMT. Thank you.

Cameron Spitzer

Cameron L. Spitzer  
1141 Jonesport Court  
San Jose, CA 95131

George & Matina Billias  
Tannersville, N. Y. 12485

1 November, 1990

Mr. William K. Reilly  
E. P. A. Administrator  
Washington, D. C. 20460

Dear Mr. Reilly:

We strongly urge that you oppose the recently proposed and/or use of manganese as an additive to gasoline. It is obvious that satisfactory studies regarding long-term harmful effects have not been conducted. Common sense and history dictate that if you are to err it should be on the side of extreme caution.

Very truly yours,

*Matina Billias*  
*George Billias*

NOV 1 10:00

William K. Reilly, Administrator.  
Environmental Protection Agency.  
401 M Street, SW.  
Washington, DC 20460.

Nov. 2nd 1991

Dear Sir,

The Ethyl Corporation once again is trying to use the entire U.S. population as test subjects.

Their wish for The E.P.A. to approve of Hi-Tec 30 so they can add it to gasoline for one reason on profit!!!!

Hi-Tec 3000 contains manganese, which is known to produce symptoms of Parkinson's disease at high doses, & long-term effects on human health are known.

Since 1925 Ethyl Corporation has been one of the main suppliers of lead gasoline additives, now known to have caused chronic lead poisoning of millions of children all over the world.

Now that leaded gas is being phased out, they are once more being very irresponsible & want to add another toxic heavy metal additive to gasoline. They knew in 1925 that 40 workers at Ethyl's plant were stricken with lead poisoning & 5 of them died, but that did not stop their lead in gasoline.

This new potential hazard to human & the environment should not be approved by the E.P.A. Stop this, before we have another real health hazard & expensive clean up.

The E.P.A. is supposed to "protect us", & it is your responsibility to do just that.

Tell Ethyl Corporation no Hi-Tec 3000 in gasoline!  
Sincerely,



Owens Group

619 Palisade Avenue  
Englewood Cliffs, NJ 07632

130 William Street  
New York, NY 10038

(201) 568-2300  
(212) 732-5290

Fax (201) 568-9646  
Telex: 5101007303

11/1/90

Dear Mr. Kelly,

I wish to record my opposition to  
your approval of "Hi-Tec 3000," a gasoline  
additive manufactured by the Ethyl Corporation.

I am not an expert, but we all know  
how much pollution is caused by automotive  
emissions. Adding to the problem certainly will  
not solve it!

Thank you for your consideration.



Robert O. Owens

00:11:00

Clive E. B. Lister  
4022 Gies Rd.  
Darrington, WA 98241

27 Oct 90

William K. Reilly,  
Environmental Protection Agency,  
401, M. Street SW,  
Washington, D.C., 20460.

Ref: Methylcyclopentadienylmanganese  
tricarbonyl, gasoline additive.

Dear Mr Reilly:

This is to urge you to approve the above manganese compound as a substitute anti-knock additive to gasoline for tetraethyllead. Manganese is far less poisonous than lead, and, as an element that is a dietary requirement in small doses, it has an established metabolic pathway in the human body. Many adults actually have a manganese deficiency, and I myself have been taking a supplement for several years, with no deleterious mental effects and some benefit. This is not to say that the element could not be poisonous to some people in excessive quantities, but it is not accumulated in the body, like lead, and essentially all materials, including foods, have some toxic level. The element is most similar to iron, out of which we make water pipes, and which is itself quite deleterious to health in too large a dose, promoting bacterial infections and heart palpitations; yet is essential for life.

I am a member of EDF, which generally does a good job of taking a balanced approach to environmental matters, but this time seems to have gone off the deep end. The similarities to the introduction of tetraethyllead by the Ethyl Corp. are disturbing if one does not know the facts. However, replacement of the lead compound by the manganese compound would be of immediate benefit to everyone except perhaps the valves of the ancient engines that still run on premium gas. It should not, clearly, be allowed in "un-leaded" gasoline, since manganese will also poison the platinum exhaust catalyst.

Very truly yours,



cc. Fred Kraus EDF

Ingrid Rameu-Compean  
1821 1/2 S. Beverly Glen Blvd.  
Los Angeles, CA 90025

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

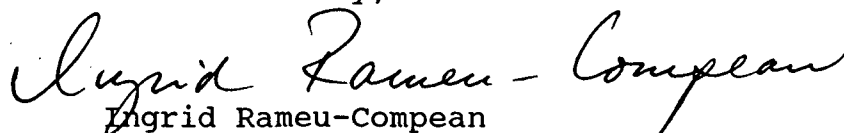
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

  
Ingrid Rameu-Compean

1 21.00

4128 Palmyra Rd.  
Hannibal, MO 63401  
Nov. 3, 1990

Mr. William K. Reilly  
EPA Administrator  
Washington, D.C. 20460

Dear Mr. Reilly:

I protest Ethyl Corporation's  
"Hi Tec 3000" proposal, which would  
release large quantities of manganese  
into the environment, a toxic  
element that would endanger  
people's health.

I urge you to reject it.

Sincerely,

Mary Hinde

Dev Atma Singh Khalsa  
Nam Kaur Khalsa  
8832 Pickford St.  
Los Angeles, CA 90035

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

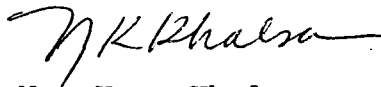
Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! We strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Dev Atma Singh Khalsa



Nam Kaur Khalsa

1000

19819 Plank Road  
Union Grove, WI 53182  
October 31, 1990

WILLIAM K. REILLY,  
Administrator  
ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C.

Dear Mr. Reilly:

We have just been told by the ENVIRONMENTAL DEFENSE FUND that the Ethyl Corporation of America is asking your agency to approve a gasoline additive it calls "HiTec 3000."

"HiTec 3000" contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease. Adding this additive to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

As you probably know, the Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a major contributing cause of chronic lead poisoning.

We urge you to reject Ethyl's application to use MMT.

Sincerely,

*Bob and Mary Ruetz*

Bob and Mary Ruetz



Dr. Satcharn Kaur Khalsa  
1800 S. Robertson Bl. #108  
Los Angeles, CA 90035

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Dr. Satcharn Kaur Khalsa

October 30, 1990  
7136 Parkview Avenue  
Falls Church, Virginia  
44224

William K. Reilly, Administrator  
United States Environmental Protection Agency

Dear Administrator Reilly,

As you are, no doubt, aware, the Ethyl Corporation has applied for approval of methycyclopentadienyl manganese tricarbonyl (MMT), an additive for gasoline.

Manganese in high doses is a demonstrated human neurotoxin. What is not known is the long-term chronic, low dose effects of human exposure to manganese.

Please reject Ethyl Corporation's application to use MMT.

Thank you,  
Phillip Loar  
Phillip Loar

21963 21st Place West  
Brier, Washington 98036  
October 30, 1990

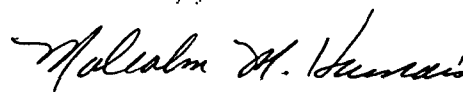
Mr. William K. Reilly  
Administrator, United States Environmental Protection Agency  
Washington, D. C. 20460

Dear Mr. Reilly,

It has come to my attention that Ethyl Corporation is petitioning for use of a replacement for tetraethyl lead as a gasoline additive. I hope that you will be VERY CAUTIOUS in any approval for the use of any heavy metal (manganese included) compound in significant quantities.

Although the environmental lobby may often overstate their case, it is clear that ultimate use of MMT as a gasoline additive will release very large amounts of manganese into the environment. As far as I know, the toxic affects of manganese are very much less well understood than that of lead. Much work needs to be done. Please be patient.

Sincerely,



Malcolm M. Harnois

22:01

P. O. Box 567  
 Ft. Montgomery, NY 10922  
 Nov. 2, 1990

Administrator William K. Reilly  
 Environmental Protection Agency  
 401 M St., SW  
 Washington, DC 20460

Dear Mr. Reilly:

I have read Dr. Ellen K. Silbergeld's report in the Environmental Defense Fund's Newsletter of Oct. 1990 on the Ethyl Corp.'s application to use a manganese-based compound (MMT) as a gasoline additive. It is clear to me that, until it is proven in an adequate test of this compound's effect on human beings that this additive is benign, its use should not be permitted.

I urge you to deny the corporation's application to make use of this additive.

Sincerely,

Richard B. Mather

100-1-110:22

Lynnwood, WA. 98036  
10-31-90

EPA Administrator, William K. Reilly  
Washington,  
D. C. 20460

Dear Administrator Reilly,

As a member of the Environmental Defense Fund, I wish to call your attention to the new product Ethyl Corporation is trying to have approved as an octane-enhancing gasoline additive. It is called methyclopentadienyl manganese tricarbonyl (MMT).

I believe Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions of tailpipe emissions if any, are very small and are overwhelmed by the health costs of exposure to manganese. Ethyl's data does not include any in-depth review of the health effects of manganese- nor--more important-- does not include any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

Manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. There is evidence that it can break DNA which may indicate cancer causing potential. I am concerned about the cumulative long-term effects on human exposure.

We have had 50 years of exposure to lead, which we now know to be hazardous to our health. Must we now start over with something equally - or possibly worse. I urge you to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

Sincerely,



Ms. Doris Still

Sat Dharam Kaur Khalsa  
1625 Livonia Ave.  
Los Angeles, CA 90035

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

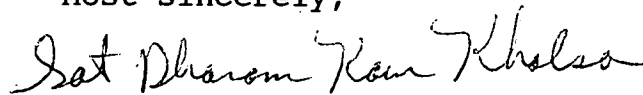
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

A handwritten signature in cursive script that reads "Sat Dharam Kaur Khalsa". The signature is written in dark ink and is positioned above the printed name.

Sat Dharam Kaur Khalsa



October 30, 1990

Dear Mr. Reilly:

Please register this letter as a protest to your agency's approval of Hi Tec 3000, as a gasoline additive. I am a governmental environmental attorney & I understand the constraints on an administrative agency's authority to deny registrations or approvals. But I urge you to push your authority to the fullest extent possible to deny this application. Further studies need to be conducted. Err on the side of protecting human health & the environment.

Terese New Richmond  
2301 E. 8th St  
Tucson, AZ 85719

ENID GRIFFIN  
810 Fernwood Pacific Drive  
Topanga, CA 90290

Oct. 30, 1990

Mr. William K. Reilly  
Environmental Protection Agency  
401 M Street, S.W.  
Wash. D.C. 20460

Dear Mr. Reilly,

Please deny Ethyl Corp.'s application  
for "HiTec 3000," a toxic manganese-  
based gasoline additive.

We must stop putting pollutants  
in our environment.

Also, could I please receive a  
copy from the Act that put your  
Agency as protector of our  
environment? I want to frame  
it - especially the phrase about  
"preventing and eliminating  
pollutants..." (to paraphrase).

Thank you for your attention  
to this matter. These are times to  
be courageous.

Sincerely,

Enid Griffin

Matty Gordon  
7321 B Street  
Springfield, OR 97478

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

*Matty Gordon*

*Also I'd like to see this agency move more expeditiously on tougher regulations for disposal of hazardous waste.*  
*W.G.*

Maurice M. Meir  
1833 11th St. #104  
Santa Monica, CA 90404

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely



Maurice M. Meir

Linda Hoffman  
151 N. Maple #209  
Burbank, CA 91505

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

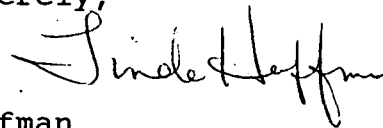
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

A handwritten signature in cursive script, appearing to read "Linda Hoffman".

Linda Hoffman

Thomas L. McCoy  
211 Lexington Ave  
East Lansing, MI 48823  
October 30, 1990

William K. Reilly  
EPA Administrator  
Washington, DC 20460

Dear Mr. Reilly,

I have read, via an environmental news-letter, that Ethyl Corporation is asking permission to use a manganese-based additive, called MMT, to its gasoline.

It seems to me that this MMT is a dangerous thing to add to the environment, something we might regret later. This stuff will probably coat everything and be very difficult to ever get rid of, and is apparently a very toxic substance.

I urge you to not allow Ethyl to use MMT, at least not until a thorough study of the possible consequences can be made.

Thank you very much for your attention,  
Sincerely,  
Thomas L. McCoy



*Jerome C Draper*

*295 Los Angeles Boulevard, San Anselmo, California 94960*

November 1, 1990

Mr. William K. Reilly  
EPA  
401 M Street, SW  
Washington, DC 20460

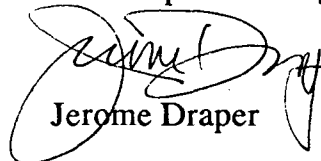
Dear Mr. Reilly:

With regard to the application by Ethyl Corporation for their "HiTec 3000" gasoline additive, I urge you to deny the application.

We on the Earth do not need more polluting compounds released into the air.  
Toxics such as this manganese-based additive should never make it out of the lab.

Thank you very much.

Kindest personal regards,



Jerome Draper

SUBJECT: USE OF ETNYL CORPORATION HiTEC 3000 PERFORMANCE  
ADDITIVE IN ALL DOMESTIC GASOLINE.

Through channels at work I became aware of this product (fuel additive) and its potential to cut our daily oil consumption by thousands of barrels per day and millions per year. In addition, this product was tested having no adversities to the environment for the past 10 years in Canada.

It would appear if Canada's EPA tested and approved this product and its 10 years of longevity show promise, we inturn should approve its use.

This nation will consume less of the Earth's natural resources and curtail imports of foreign oil lowering our National Spending abroad by billions each year.

Canada and the United States share one thing in common, we breath the same air. I am requesting we do not cloud the issue of clean air by negligence in passing environmental issues that can only benefit us as a whole.

Due to my resent knowledge of this product, I am writing to you rather late. A decision must be made by your agency in early November. In all sincerity, I hope your decision is favorable. We have a bill in Congress to balance our budget which appears to be taking a second seat to politician concerns over "nice ties and votes" while Americans endure wasteful government. Lets not waste our air by spouting out useless words or emitting automobile pollution, but do what is most beneficial to us and our environment.

In business, an employee's goal is cost reduction for continued success of that business. In government...Health, Welfare, and National Security are issues to be addressed Today for continued existance of all occupants Tomorrow. Please pass the use of HiTec 3000 in domestic gasoline as a step in accomplishing a higher quality of living for all.

Sincerely,

Carl J. Cummings  
1619 Best Blvd.  
Wichita Falls, TX 76303

Carl J.D. Cummings  
"Occupant of the planet Earth"

R. J. Kesindegua  
Roy A. Oston  
Don Rogner  
Wilson James  
[Signature]  
NOV 11 1981  
COMM CONTROL  
BY  
RECEIVED



Joanne Thompson  
1903 El Camino de la Luz  
Santa Barbara, CA 93109

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

  
Joanne Thompson

Edwin A. Loberg  
4412 Banff Street  
Annandale, VA 22003

4412 Banff St.  
Annandale, Va.  
11/4/90

Administrator Reilly  
EPA

I would like to support  
the addition of a fuel additive  
to gasoline nationwide that  
would reduce tailpipe emissions.  
I am aware of one such  
additive called Hi Tec 3000,  
made by the Ethyl Corp.

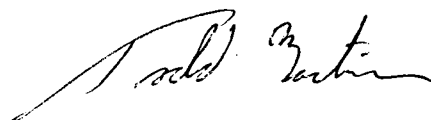
Sincerely,  
Edwin A. Loberg  
Col. USAF, Ret.

Nov, 3, 1990

Dear Administrator Reilly,

As an environmentalist, I strongly urge you to deny Ethyl Corporation's application for "Hi Tec 3000", a toxic, manganese-based gasoline additive. It is not worth using humans as guinea pigs to find out what this toxin's adverse affects are on us.

Sincerely,



Todd Martin  
9120J Tumbleweed Run  
Laurel, Md 20723

PCWCA 0 64:12



P.O. Box 1 • Woodstock, Georgia 30188

November 2, 1990

Mr. William Reilly  
Administrator-EPA  
Washington, DC 20460

Dear Mr. Reilly,

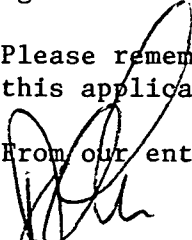
As a family, we urge you to reject the Ethyl Corporation application to use MMT.

This is not the road we need to be taking in regards to our overall health goals for all Americans. It is time to say no to those companies who would willingly pollute our environment.

We do not accept Ethyl's contention that the manganese releases will be insignificant and not toxic. That's an old story that's been proven false time and time again.

Please remember the welfare of our children and of their children and reject this application.

From our entire family, thank you.

  
John T. Feigert  
Virginia Feigert  
Joshua Feigert  
Jessie Feigert

4000 Cathedral Ave., N.W.  
Washington, D. C. 20016

October 30, 1990

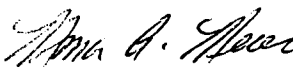
Mr. William K. Reilly  
EPA Administrator  
Washington, D. C. 20460

Dear Mr. Reilly:

My niece is married to a Dutchman and has lived in Holland for about 20 years. While they were visiting me this summer, her husband told me that in Holland they use liquid propane gas in their automobiles. He said it is clean, not too expensive, and it doesn't take much to convert for use in an automobile. They also tell me most cars are using this.

Has this been looked into for use in the United States? I know there is a lot of politics in all business, but if it will help our country in any way maybe it is something we should give some thought to.

Sincerely yours,

  
Mona A. Meier



## THE NATURE OF THINGS

#4 Brushwood Farm, Lenox, MA 01240 (413) 637-4373

October 23, 1990

William K. Reilly  
EPA Administrator  
Washington DC 20460

Dear Mr. Reilly,

Please REJECT Ethyl's application to use Methycyclopentadienyl manganese tricarbonyl (MMT). The parallels to lead additives are frightening!

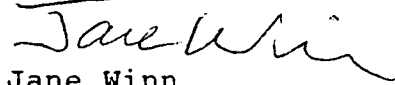
Not much is really known at this time, about how manganese in gasoline would really effect us - not much was known about lead either. Now we are finding out more and more harm it caused.

Manganese at high doses is a demonstrated human neurotoxin with persistent and irreversible pathological effects on brain structures, resulting in severe impairments in movement and mental state. There are indications that manganese may selectively affect the fetus and the very young and very old. There is evidence that it can break DNA which may indicate carcinogenic effects.

Please show that we have learn the lesson that adding lead taught us over the last 50 years! Reject Ethyl's application to use MMT.

Please let me know of your decision. This is an issue that greatly concerns me. Thank you.

Sincerely,

  
Jane Winn

155 Avenida Drive  
Berkeley, CA 94708

October 23, 1990

William K. Reilly  
Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

Dear Mr. Reilly,

I am writing to you regarding the gasoline additive called "HiTec 3000" which the Ethyl Corporation of America is trying to get approved. Adding "HiTec 3000" to gasoline will release large amounts of manganese into the environment. The long-term effects of manganese on human health are unknown.

I am urging you not to approve this additive. You have to remember that this is the company who put lead into gasoline and, even after several of their workers died of lead poisoning, ignored the obvious warning signs. We cannot let Ethyl Corp. put another toxic heavy metal additive in gasoline. There is no reason to open our environment to a new health hazard. I am sure you are well aware that the cleanup costs are prohibitive. So why not prevent them in the first place!

Yours sincerely,

*Traude Buckland*

(Mrs. Traude Buckland)

10/23/90

Administrator Wm. K Reilly  
EPA  
401 M ST SW  
Washington, DC 20460

Dear Administrator Reilly:

As an environmentalist and active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "Hi Tec 3000", a toxic, manganese-based gasoline additive.

Sincerely,

Rondi Lightmark  
RR #4, Box 785  
Guilford, Vermont  
05301



October 22, 1990

Bonnie Messenger-Dodge  
P.O. Box 1297  
Tahoe City, CA 95730

William K. Reilly  
Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460


Dear Mr. Reilly,

I understand that Ethyl Corporation is asking you to approve yet another toxic heavy metal additive for gasoline - HiTec 3000. My limited, but accurate, sources on this additive have made it clear that it is not safe for our children, ourselves, or the environment in which we must all live together.

Please, please, please, protect us from the emissions of manganese that will result from this supposedly safe additive. We have enough to worry about already without adding more unsafe emissions to the air we breathe.

I wish you people in Washington would stop thinking short term and realize that we have to put some money into alternative, i.e. solar and electric, powered automobiles now, before the crisis is so severe that we can't turn back. I have 2 children and would like to think that there is hope that they too can find someplace in this country (LA appears to already be a lost cause) to breathe "fresh" air.

Thank you for listening.

  
Bonnie Messenger-Dodge

ahimsa technic, inc.  
4802 south peninsula drive, ponce inlet, florida 32127

Mr. William K. Reilly, Administrator  
United States Environmental Protection Agency  
Washington, D. C. 20460

October 24, 1990

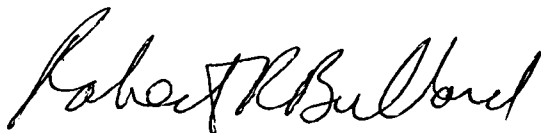
Re: Methycyclopentadienyl Manganese Tricarbonyl (MMT) Gasoline  
Additive

Dear Mr. Reilly:

During the last couple of months I have been reading of Ethyl Corporation's plans to introduce the referenced product as a gasoline additive. As I recall from my years of water treatment systems design, manganese in a neutral to acidic aqueous solution is almost as toxic as lead. I strongly urge you to deny any approvals the EPA must give for the use of this product until it can be proven that it will not be a hazard to our natural ecosystems. With the prospect of acid precipitation being a way of life in our future, all heavy metals dislocated in the course of human utilization will be comparably insidious in the natural environment, the food chain and our bodies. Just now we are finding enormous lead levels popping up all over the place as acidified aqueous ecosystems are permitting greater and greater uptake by biomagnifying organisms.

It is better to say no and be safe.

Most respectfully,



Robert R. Bullard, P. E.  
President

ETHYL01

cooperative betterment through  
science and technology

904/761-0774  
255-9400

October 22, 1990

Mr. William K. Reilly  
EPA Administrator  
Washington, DC 20460

Dear Mr. Reilly:

I am a very concerned parent, and I respectfully urge you to reject Ethyl's application to use MMT - the manganese-based compound as a gasoline additive.

I cannot believe that adding massive amounts of this toxic metal to our environment will not have any harmful effect.

May I please hear from you if you think that we have nothing to worry about.

Sincerely,

*K. Bevash*

Katherine Bevash  
2342 Rue de Anne  
La Jolla, CA 92037



Mr. & Mrs. John F. Brensinger  
1176 Spring Prairie  
Burlington WI 53105

DEAR MR REILLY,

I HAVE BEEN READING  
ABOUT THE POSSIBLE USE OF A  
TOXIC MANGANESE-BASED GASOLINE  
ADDITIVE.

I BELIEVE IT IS IN THE  
BEST INTEREST OF THE CITIZENS OF  
THE UNITED STATES TO REJECT / DENY  
ETHYL CORPORATION'S APPLICATION FOR  
"HITEC 3000".

SINCERELY,

John F. Brensinger III

610:52

10/24/90

Administrator William K. Kelly  
401 M St. SW  
Washington, DC 20460

Dear Sir:

I'm writing you as a physician and a parent to ask that you turn down Ethyl Corporation's bid to add HITEC to gasoline.

The effects of a new heavy metal in the air of our cities and countryside is too problematic to our children's and our health.

There is no reason for us all to be guinea pigs in a potentially lethal experiment.

Thank you for whatever you can do to stop this.

320 W 86 St.  
NY 10024

Sincerely,  
Anna Rand, M

October 22, 1990

William K. Reilly  
EPA-Administrator  
401 M Street SW  
Washington DC 20460

Dear Sir:

I am a member of EDF and a very concerned American, concerned about our environment. I am writing you this short note to ask you to reject Ethyl Corporation's application for their new gasoline additive, methycyclopentadienyl manganese tricarbonyl (MMT).

I think it's important to reject this because there are so many unanswered questions about the effects manganese will have. We had one bad experience with Ethyl Corporation's gas additive "tetraethyl lead", let's not do it again. We can't afford it! I am urging you to please reject Ethyl's request.

Thanking you in advance,



Lori Aquino

October 22, 1990

Mr. William K. Reilly, Administrator  
Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460

Dear Mr. Reilly:

I have been informed by the Environmental Defense Fund of the effort by Ethyl Corporation to have the gasoline additive "HiTec 3000" approved.

The information issued by the EDF on this product, and the potential hazards it could cause, is very alarming to say the least.

Please consider these points:

- 1) Can we really afford to allow yet another chemical to be released into our breathing air and atmosphere?

\*\*\*\*\* NO!!! \*\*\*\*\*

- 2) Do we want to send a message to industries to pursue research and development for enhancing gasoline for automobiles rather than pursuing development of non-gasoline automobiles?

\*\*\*\*\* NO!!! \*\*\*\*\*

- 3) Do the benefits of this product outweigh the possible (but surely inevitable) damage it will do to humans and our air?

\*\*\*\*\* NO!!! \*\*\*\*\*

I urge you not to approve the Ethyl Corporation's application for "HiTec 3000".

Sincerely,

*Katy Glass*

Katy Glass  
(EDF Member)

2000152 610:11

cc: Mr. Fred Krupp, Executive Director  
Environmental Defense Fund

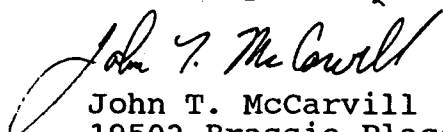
Administrator William K. Reilly  
Environmental Protection Agency  
401 M Street. S.W.  
Washington, D.C. 20460

October 24, 1990

Mr. Reilly,

I am writing this letter to urge you to reject Eythl Corporation's proposal of introducing "HiTec 3000" as a gasoline additive. As a member of the Environmental Defense Fund, a Genetic Toxicologist and a citizen of the United States, I find Eythl Corporations proposal of introducing toxic manganese into the environment distressing especially now when both individuals as well as corporations need to consider environmental concerns above all others, particularly monetary gains. Now, we have the opportunity to stop a mistake before it happens, unlike the addition of lead to gasoline of which we are now spending millions of dollars in clean-up efforts.

Sincerely,

  
John T. McCarvill  
19502 Brassie Place  
Gaithersburg, Md. 20879

2200158 610:11



10/19/90

William K. Reilly  
EPA

401 M ST, SW

Washington, D.C. 20460

Dear Mr. Reilly:

I urge you to deny the Ethyl Corp. application for Hi-Tec 3000 gasoline additive. This product contains heavy metal manganese, which should not be added to the environment. Long term chronic, low-dose effects of human exposure are not known, and the population should not be used as test subjects. Contamination of the environment by manganese will occur in many places and will not be easily reversed. Let's learn from the past (i.e. lead contamination) and not repeat our mistakes.

6006150 Thank you  
510:11

William A. Hand

WILLIAM HAND  
131 PINEBROOK RD.  
LINCOLN PARK, NJ 07035

20 October 1990

Environmental Protection Agency  
Attn: Administrator, Mr. William K. Reilly  
401 M Street, SW  
Washington, DC 20460

Dear Mr. Reilly:

It has been called to my attention that the Ethyl Corporation of America has requested approval of a gasoline additive called "HiTec 3000." It is my understanding that this additive would release large amounts of manganese into our environment.

I urge you to disapprove this additive! It has taken many years to limit the harmful effects of lead additives to gasoline. The last thing we need to do at this time of increased public awareness and concern is to introduce a new source of pollution.

I hope your agency will live up to its name and protect our environment from additional pollution.

Thanks in advance for your support.

Sincerely,



K. L. Dendinger

132 Kings Chapel Road  
Augusta, GA 30907

900CT 29 P10:13

35079

CORR. CONTROL

EP

NEOL-AD

David Makulec  
854 West 181st Street  
Apartment #5A  
New York, New York 10033  
(212) 781-3097

Administrator William K. Reilly  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

October 24, 1990

Administrator Reilly:

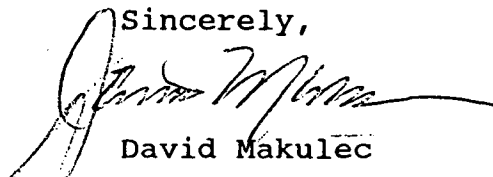
I am a member of the Environmental Defense Fund and an individual concerned that business and government will once again fail to protect the public from exposure to hazardous exhaust emissions.

Ethyl Corporation has applied to your agency for approval of a gasoline additive called "HiTec 3000," which contains manganese-- a toxic chemical whose high-dose risks are well-documented and whose long-term low-dose risks have been inadequately researched. To approve this additive will subject our population to unknown risks that will be costly to cure years later, a situation our experience with Ethyl's promotion of leaded gasoline not so long ago makes all too familiar.

The purported reductions in tailpipe emissions that might be achieved with this additive are small by comparison to the risks undertaken in the process. There are so many ways to reduce emissions and increase fuel efficiency that do not require the addition of toxins to our air that it would be foolish to accede to Ethyl's request. Instead, your agency and the rest of the government and business sectors should devote time, money, and energy to pursuing safer alternatives with greater benefits.

I hope you will deny Ethyl's application to approve "HiTec 3000," and so avoid regretting a future filled with illness and expensive cleanup efforts. There are so many paths to follow--it would be thoughtless to pursue such a risky one for so little benefit.

Sincerely,



David Makulec

15.78

RECEIVED  
EPA  
CORR. CONTROL  
38118  
900CT 30 A2: 38

Michael M. Davis  
50 Mendum Street  
Boston, MA, 02131

Oct. 18, 1990

William K. Reilly, Administrator  
Environmental Protection Agency  
Washington, DC, 20460

Dear Mr. Reilly:

I have recently become aware of a plan (of Ethyl Corp.) to introduce manganese into gasoline! After all the years it took to get the lead OUT, now they want to put another toxic heavy metal IN.

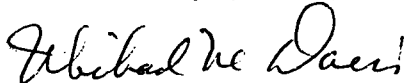
Lewis's Pharmacology, one of the best known texts on the subject, said about manganese as long ago as the 1970 edition, "Chronic poisoning may occur following prolonged inhalation of manganese dust ... The main symptoms are due to damage to the central nervous system and the liver ... " .

There MUST be a better way. This is certainly not it. Introducing known toxins into motor vehicle fuel residuals certainly is not sane, let alone a prudent approach to deal with the health of 250,000,000 people in this country.

If you have the results of epidemiological studies carried out over the past twenty years proving that manganese is harmless, I wish you would send references of those studies to me. Better, send me copies of the studies.

I request that you reject Ethyl's application to use MMT. (Hi Tec 3000)

Sincerely yours,



Michael M. Davis

cc/ Environmental Defense Fund  
Sen. Edward Kennedy

RECEIVED  
EPA  
CORR. CONTROL  
37368  
OCT 24 AM 11



EPA Administrator  
William K. Reilly  
401 Main Str. SW  
Washington D.C. 20460

10/22/90

SUBJECT: ETHYL CORP.

Dear Mr. Reilly

As owner of J.K.Engineering, a consulting Co. I'm well aware what impliments the driving force of large corporations. Unfortunately the environment or the people are respected as in this case. Ethyl Corp. is asking for the approval of HI TEC 3000. Please make shure this will be NOT allowed.

Yours truly,



Jan Knabe



RECEIVED  
EPA  
CORR. CONTROL  
38026  
900CT 29 P10:24

22 October, 1990

Shari Sirkin  
P.O. Box 80295  
Fairbanks, AK 99708

Administrator Reilly,

We know that manganese at high doses is a human neurotoxin, with serious effects on brain structure. HOW COULD THIS BE ENVIRONMENTALLY BENEFICIAL, as Ethyl Corporation suggests? And we don't know what a safe level of exposure is.

For these very simple reasons, I strongly urge you to reject Ethyl's application for HiTec 3000. It makes absolutely no sense to be using a potentially dangerous compound as a gasoline additive, even if it were to improve fuel efficiency.

There are so many non-toxic, non-polluting and inexpensive ways to reduce emissions and save gas/oil. Because of the extent of all the environmental problems associated with vehicles, the EPA should be in the forefront of efforts to reduce fuel consumption in the first place, by encouraging carpooling and the use of public, mass transportation, and specifically, focusing on R & D for appropriate technology!

Using harmful chemicals and massive amounts of energy to produce a known poison with persistent and irreversible pathological effects on the brain just to add to gasoline so our big, heavy cars can get a little bit better gas mileage and possibly enable our cars to last a little bit longer is totally absurd. Particularly when there are alternatives.

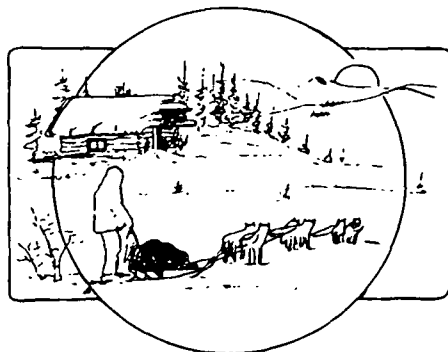
As a concerned citizen, I ask you to please deny Ethyl's application for MMT.

Sincerely,



Shari Sirkin

# BROOKS RANGE



## WILDERNESS TRIPS

### DEPOSIT POLICY

A \$500.00 deposit is required with your application. Deposits will be refunded less a \$60.00 handling fee, if you cancel 90 days prior to the reservation date. After that, deposits will be refunded only if your space can be filled. You may also apply your deposit to a different date the same or following year. Full payment of the trip is due 30 days prior to your arrival.

### LIABILITY RELEASE

In consideration of, and as part of my payment for the right to take part in any services arranged, the undersigned, for himself and his heirs and assigns, hereby release Brooks Range Wilderness Trips and their employees from any liability for claims or lawsuits brought by the undersigned and arising out of the activities provided by Brooks Range Wilderness Trips.

I have read, understand and accept the terms and conditions stated herein and acknowledge that this agreement shall be effective and binding upon us during the entire period of participation in the activities.

Signature of trip participant:



## 1991 DOGSLED TRIPS

*February through April*

### Brooks Range Arctic Adventure (6 days) \$1499

Experience the thrill of driving a team of well-trained Alaskan huskies through pristine wilderness. Circumnavigate a small mountain range, travelling along frozen rivers and narrow trails. Snug wood-heated cabins each night. Superb home-cooked meals have become one of our trademarks. Trip covers 80 beautiful miles. Most experienced year-round local guides.

### Challenge of the North Expedition (7 days) \$1799

A thrilling adventure for those who have had some dog driving experience. You'll drive a team deep into the Brooks Range, sometimes breaking trail to explore new country. Most nights we'll be making camp in heated wall tents under thousands of stars and the Northern Lights. Rugged and challenging, scenery unforgettable. The ultimate Arctic experience. Limited to two persons per trip.

### April Trips

### Arctic Divide Photo Adventure (5 days) \$1375

We'll fly you from Bettles to the Eskimo community of Anaktuvuk Pass where we will base in a small house. Each day we will travel into a different valley along the Continental/Arctic Divide. Spectacular mountains, all above treeline. Great home-cooked food and comfortable accommodations each night in the village. We will fly you back to Bettles the morning of day 6 where you can make connections to Fairbanks. A photographer's dream.

### Arctic Divide Expedition (7 days) \$1925

A challenging trip for the adventurous! Prior dog driving experience highly recommended. Breathtaking scenery and very long days. Lots of ice travel and expect some wind. Most nights we'll make our own camp and sleep in a heated tent. Our longest trip, covering 120 miles of rugged wilderness. Our journey ends in Bettles. Limited to one person. Don't miss this one!

*Expedition class sleeping bag, parka, down pants, boots, and mitts are provided for dogsled clients.*

*A variety of custom trips can be arranged.*



Call us at (907) 692-5312

## 1990 SUMMER TRIPS

*All trips below can be run on your groups dates between June 8 and September 8.*

**John River Float and Day Hike (8 days) \$1,150**  
Mountain scenery, good wildlife, great family trip, rafts or canoes.

**Killik River Arctic Wildlife Float (10 days) \$1,850**  
North slope, above treeline, very few people visit, abundant wildlife, good hiking, sand dunes, wolves. Rafts or Folbots.

**Arrigetch Peaks Hike and Float (10 days) \$1,325**  
Spectacular jagged peaks, glacier, tarns and pingoes, peaceful Alama River raft, canoe or Folbot float.

**North Slope Rivers Exploration (10 days) \$1,825**  
Remote, seldom visited area, above treeline, caribou, grizzly, moose, falcons, wolves. Class 2 rapids, spectacular wilderness. Rafts.

**Upper Noatak River Float and Day Hike (10 days) \$1,900**  
Outstanding scenery and wildlife, Gates of the Arctic National Park, great fishing, above treeline, raft, canoe or Folbot.

**Gates of the Arctic Backpack (10 days) \$1,599**  
Several spectacular routes, dall sheep, canyons, popular backpack route but no trails. Can be combined with a float trip.

**Kobuk River Fishing Adventure (10 days) \$1,599**  
Beautiful spruce taiga forests, bear, moose, osprey, excellent fishing for several species, ends at a small Eskimo village, canoe, raft or Folbot.

*Many other trip possibilities including caribou migration photography, hot springs, basecamps on remote lakes, and a variety of float and backpack trips. Ask us about custom and family trips.*

WE KNOW WHERE TO GET AWAY FROM THE CROWDS!

10/23/90

Jim K. Reilly, Administrator  
Environmental Protection Agency  
Washington D.C. 20460

Mr. Reilly:

As you to reject Ethyl Corporation's  
petition to use MMT as an additive to gasoline  
suspend all currently permitted use of  
these as a gasoline additive in the  
United States.

This request is based on arguments in the  
recent paper which will appear this week  
in ENVIRONMENTAL COLUMN in THE MENDOCINO  
COUNTY OBSERVER, P.O. Box 490, Laytonville CA.  
95454.

Sincerely,

Lester C. Van Atta (Ph.D.)

LESTER C. VAN ATTA  
P. O. Box 5  
Laytonville, CA  
95454-0005

## FROM LEAD TO MANGANESE IN CAR EXHAUSTS.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God". It took 50 years to realize the lethality of car exhausts loaded with tetraethyl lead. Finally, after a hard-fought battle, the Environmental Protection Agency, instigated and assisted by the Environmental Defense Fund, has succeeded in getting most of the lead removed from gasoline.

Now, in 1990, Ethyl comes bearing another gift. This time it is methycyclopentadienyl manganese tricarbonyl (MMT). Ethyl is asking EPA to approve this chemical monstrosity as an octane-enhancing gasoline additive. EPA's answer, of course, should be a flat "No", based on our continuing tragic experience with the lead additive.

Lead poisoning continues to be an epidemic in the U.S. Even after considerable reduction of lead in gasoline has been accomplished through prolonged litigation, we face the almost impossible problem of cleaning up the residues of lead fallout from playgrounds, backyards and roadsides throughout the country.

The parallels between Ethyl's recent proposal to use manganese and its earlier proposal to use lead are chilling. The sole justification for each additive is its effect in reducing emissions of hydrocarbons and nitrous oxides from car exhausts. Nothing was said in either case about deposition in surface dusts or the effects of exposure to humans. In both cases, Ethyl argued that the amount of the chemical to be added to gasoline would be negligible and the amount released to the environment would be insignificant.

In a well funded ad campaign, claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit the public's concern over pollutants in global and local air. Actually, the purported reductions would be small at best, and would be overwhelmed by the health costs of longtime exposure to manganese.

We do not know what the effect of manganese would be on humans exposed to light doses over long periods of time, never having made the massive human experiment. We do know that manganese in higher doses is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. And there are indications that manganese may selectively affect the fetus, the young, and the aged.

From our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use on human exposure. We know that the gradual contamination of the environment with manganese will not be readily reversed. We know that manganese will accumulate in urban dusts and soils with close human contact.

Based both upon what we know and what we should know - but don't, the Environmental Defense Fund is urging the Environmental Protection Agency to reject the Ethyl Corporation's new proposal and immediately to suspend all currently permitted use of manganese as a gasoline additive in the United States.

x x x x x

This article is based on one by Dr. Ellen K. Silbergeld of the Environmental Defense Fund, 257 Park Avenue South, New York, N.Y., 10010.

MARIE DONNELLY  
139 Chestnut Street  
Montclair, N. J. 07042  
(201) 746-1042

Nov. 8, 1990

Mr. William K. Lidy  
EPA Administrator  
Washington DC 20460

Dear Mr. Lidy,

Please suspend all use of  
manganese as a gasoline additive and  
prohibit any future use of it as an  
additive in gasoline. It's not  
too late about manganese and how  
to ban its use as we have had to  
do with lead. Fight Ethyl's application  
to use MMT. We need to fight for  
the future now!

Sincerely yours,  
Marie Donnelly

November 8, 1990

William K. Reilly  
EPA Administrator  
Washington, D C 20460

Dear Mr. Reilly,

Bad enough to have been subjected to the lead in gasoline, but now the Ethyl Corporation would compound our pollution problem with manganese additives!

PLEASE, PLEASE do not approve Ethyl's application for use of MMT in gasoline!

Sincerely,

*Charmian Kulka*

Charmian Kulka  
7851 Brookside Ave.  
Sebastopol, CA 95472

14 315:21



November 3, 1990

Mr. William K. Reilly  
Environmental Protection Agency  
Washington, DC 20460

Dear Mr. Reilly:

We are writing to you about our concern with the possible use of, methycyclopentadienyl manganese tricarbonyl (MMT) in gasoline as a octane-enhancing additive.

We know that the Ethyl Corporation has claimed that using MMT can reduce tailpipe emissions. These purported reductions, if any, are very small, and are overwhelmed by the health costs of any exposure to the manganese that this additive will cause.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We do not know what a "safe" level of manganese exposure is, particularly for the young and the aged, who may be at increased risk.

We feel that approving the widespread use of this manganese product would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition.

Please reject Ethyl's application to use MMT.

Very Sincerely Yours,

Lorraine Bagan  
628 Robin Drive  
Santa Clara, CA 95050

William K. Leilly  
Environmental Protection Agency  
401 M. Street - SW  
Washington D.C. 20460

I recently found out about  
Ethyl Corporations application to use  
a new product "Hi Tec 3000" in  
their gas. I strongly request  
that you deny this.

Sincerely,  
Julie Bibler  
3170 NE 27th  
Bend Ore  
97701

Sara Oaklander  
24 Coleman Rd.  
Arlington, MA 02174

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

  
Sara Oaklander

Patricia Cameron Vitiello, LCSW

1303 RAMONA AVE. • SPRING VALLEY, CALIFORNIA 92077 (619) 698-3964 (213) 821-0508 LICENSE LE9356

November 5, 1990

Dear Mr. Reilly,

This letter is written to ask you to please reject Ethyl's application to use MMT as we do not know the possible longterm adverse effects.

Look at our experience with lead. Please do not endorse another such deadly decision.

Thank you.

Sincerely,

Patricia C. Vitiello

DR. DOROTHEA L. CAPPADONA  
23 WATCH WAY  
LLOYD NECK, NEW YORK 11743

November 7, 1990

William K. Reilly, EPA Administrator  
Washington, D.C. 20460

Dear Mr. Reilly:

I read, with extreme consternation, that the Ethyl Corporation is asking the EPA to approve the addition of methycyclopentadienyl manganese tricarbonyl (MMT) to gasoline as an additive to enhance octane. I urge you not to approve of this additive for the following reasons:

1. No data has been submitted on the long-term effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.
2. The claim that manganese releases to the environment will be insignificant and toxic only at high doses, is false. Given the ever-increasing reliance on the automobile, and traffic congestion in virtually every urban and suburban area in the country, the build-up of any toxic substance requires an ever-decreasing amount of time to become toxic.
3. Purported reductions in tailpipe emissions will easily be offset by the increase of manganese in the atmosphere, etc. We still do not have an accurate estimate of the expected effects on public health from manganese exposure which emanate from tailpipe emissions.
4. There is no data which indicates the impacts of manganese additives on manganese levels in other parts of the environment.
5. At high dosages, manganese is a neurotoxin (to humans), with persistent and irreversible pathological effects on brain structure, resulting in severe impairments in movement and mental state. Manganese affects the fetus, the young, and the aged. Manganese can break DNA, and is probably a carcinogenic. We do not know the full effects of long-term, chronic, low-dose exposure to manganese on humans. Nor do we know what is a "safe" level of exposure.
6. We do know that the effects of gradual, cumulative accumulation of manganese will not be easily reversed.
7. After experiencing the dreadful effects of leaded gasoline, an additive whose use was approved without proper study, one must be wary of ill-thought-out proposals.

At this time, do not approve the use of MMT!!!

Thank you.

Yours truly,  
Dorothea L. Cappadona

30 October, 1990

MEMORANDUM TO: William K. Reilly  
EPA Administrator  
Washington, D.C. 20460

FROM: Clayton Lewis  
312 North Brighton  
Dallas, TX 75208

RE: Gasoline additive

This is to urge the ENVIRONMENTAL PROTECTION AGENCY to reject an application to use a manganese-based compound as a gasoline additive.

Because of our unhappy experience with lead in gasoline, we know a great deal about the likely effects of this manganese compound over a long period of time and such effects would not be reversed readily.

Therefore, I add my request to that of others that this application be denied.

XC: file



## LOYOLA LAW SCHOOL

November 7, 1990

William K. Reilly  
E. P. A. Administrator  
Washington, DC 20460

Dear Sir:

I write to urge you to reject the pending application of the Ethyl Corporation to use MMT as an additive to gasoline.

There is adequate information available concerning the potential dangers of this toxic metal compound, both as a carcinogen and otherwise, to raise serious doubts as to its being safe for human ingestion at any level. Furthermore, the parallel with environmental lead degradation - emanating in large measure from this same applicant, and involving a similar product - is chilling. Finally, scientific knowledge as to the long term, cumulative effects of this substance in the environment does not allay these fears; and the applicant makes no effort to rectify that problem, relying instead upon unsubstantiated claims similar to its 1925 lead additive ones. This gambling with the health of future generations must be stopped.

Sincerely,

Curt Garbesi  
Professor of Law

CG:cmb

*Humanistic Growth Center of Brevard*

1007 Palmetto Avenue  
Melbourne, Florida 32901  
(407) 727-7090

Nov 9, 1990

E.P.A Administrator

William K. Reilly

Wash. D.C.

Dear Sir:

I urge you to reject Ethyl's  
application to use MMT.

Sincerely, Yours,

Marcelene M. Thompson



Maria Roche  
1919 S. Ashland  
Chicago, IL 60608

William K. Reilly  
EPA Administrator  
Washington, DC 20406

Dear Mr. Reilly,

As a member of the Environmental Defense Fund, I have recently come to know of Ethyl's application to use MMT. I have also become informed of the dangers of accepting this application. My greatest fear is that there is not enough data amassed as of yet in order to make a sound decision. Secondly, I am concerned that the information we do have about manganese indicates that to use it on a wide-spread level would endanger the lives of many Americans unnecessarily. Manganese at high dose has pathological effects on brain structure and results in severe impairments in movement and mental state. Manganese may also selectively effect the fetus, the young and the aged. We do not know the long-term chronic, low-dose effects of human exposure to manganese. We do not know what a safe level of manganese exposure is, and we do not know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate a cancer causing potential.

I sincerely urge you to reject the Ethyl application on the grounds that there is not enough scientific information available as of yet to conclude it's safety and that the information that does exist indicates that it is better left out of our country's gasoline.

Sincerely,

*Maria Helen Roche*  
Maria Helen Roche

14 145:01

11/1/90

Wendi Mirabella  
117 S. Gardner  
Los Angeles, CA 90036

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Wendi Mirabella

Scott Gelb  
2521 Beverly Ave. #5  
Santa Monica, CA 90405

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

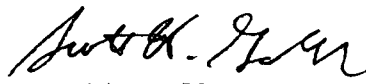
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Most sincerely,

  
Scott Gelb

Misty Carey  
400 S. Beverly Dr. #214  
Beverly Hills, CA 90212

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Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

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Most sincerely,

  
Misty Carey

Candace Haskell  
4040 Grand View #71  
Los Angeles, CA 90066

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

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Most sincerely,



Candace Haskell

Joanna Tkaczyk  
525 S. Ardmore Ave. #150  
Los Angeles, CA 90020

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

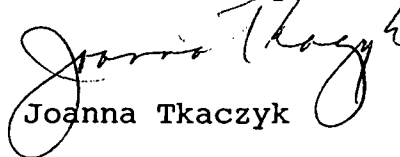
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Most sincerely,

  
Joanna Tkaczyk

DAVID DICHNER

*Certified Public Accountant*

2850 OCEAN PARK BOULEVARD, #292  
SANTA MONICA, CALIFORNIA 90405-5216

(213) 450-8588

FAX (213) 392-9392

November 8, 1990

Mr. William K. Reilly  
Environmental Protection Agency  
Washington, D.C. 20460

Re: MMT

Dear Mr. Reilly:

Better safe than sorry. Reject the application for the use of MMT.

Sincerely,

A handwritten signature in dark ink, appearing to read 'David Dichner', with a stylized flourish at the end.

David Dichner

DD:bb

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4175  
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# A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won

removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.



ELLEN K. SILBERGELD

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

Lead poisoning is an epidemic in the U.S. Even after considerable reductions

*Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.*

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



Kirk Condyles/Impact Visuals

*With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.*

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor—more important—any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But *both what we know and what we do not know* about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do *not* know what the long-term chronic, low-dose effects of human exposure to manganese are. We do *not* know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do *not* know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer-causing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

*Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.*

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

**EDF MEMBER ACTION ALERT**  
Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.



## EDF and Cancer Researchers Join to Save the Pacific Yew

**P**rominent cancer researchers and ten environmental groups joined EDF in petitioning Interior Secretary Manuel Lujan to list the Pacific yew (*Taxus brevifolia*) as a threatened species under the Endangered Species Act. Simultaneously, the American Cancer Society urged Lujan to "take any and all actions to protect the Pacific yew as a 'threatened species.'"

The bark of the tree, a slow-growing species found mainly in the ancient forests of the Pacific Northwest, is the only known source of taxol, one of the most promising new drugs for treating various cancers, including advanced ovarian cancer. A shortage of natural taxol is constraining medical research, and all attempts to synthesize the drug have failed.

"It is incredible that the Pacific yew receives virtually no protection on either private or public lands, in view of its rarity and importance to cancer research and treatment," said EDF attorney-scientist Bruce S. Manheim, who drafted the petition to Lujan.

The Pacific yew was once found widely in forests from Alaska to central California, but it has been seriously depleted by heavy logging. According to one estimate, only 5% of original Pacific yew habitat in ancient forests remains.

The thin bark of the yew makes it particularly vulnerable to clearcut logging and burning. Moreover, the yew does not grow fast enough to reestablish itself in tree plantations during the typical 50-to-80 year rotation.

Taxol's extraordinary effectiveness as an anti-cancer compound was shown in a recent trial in which it produced a positive response in 30% of ovarian cancer patients who had not responded to previous treatment. Preliminary results from other



Attorney-scientist Bruce S. Manheim has worked with 30 states to develop programs to protect endangered wild plant species.

studies suggest that taxol may also help in treating breast cancer, non-small cell lung cancer, head, neck, and stomach cancers, and malignant melanoma.

Listing the Pacific yew as a threatened species would authorize the Federal Government to protect the species from habitat destruction and commercial exploitation. It would permit a controlled sustainable harvest for medical research while prohibiting unauthorized collection of the tree for other purposes.

"The yew is a tangible example of the need to protect forests and the myriad living resources within them," said Manheim. "If we do not, we will have squandered a rich storehouse of natural products that, like taxol, may have enormous medical value."

## Task Force to Study Fast-Food Trash

*Continued from page 1.*

it has the clout and the ability to make this an important study by transforming the recommendations into an impressive set of actions. The joint study could have broad implications for all producers and users of plastic and paper packaging, in both food and non-food industries," Denison said.

Krupp emphasized the unique nature of the task force. "We hope this process will demonstrate how business and environmental groups with very different perspectives can nevertheless work together to improve the environment," he said. "At the same time, our agreement provides for each organization to preserve its independence and integrity." He emphasized that EDF will continue to pursue strong legislation and litigation on solid waste issues.

### Press Reaction to Joint Announcement

"Big Mac Joins With Big Critic To Cut Trash"

—The Wall Street Journal

"...may break ground in the fight to protect the environment."

—The Boston Globe

"The concept of peaceful negotiation of differences may not find many takers in the Middle East. But it's gained new life here at home between a major environmental group that usually sues waste-producers and one of its most likely targets, the giant McDonald's fast-food chain."

The Tribune, Oakland, California

"One welcome side effect of the plan is McDonald's decision not to build incinerators at its restaurants to burn wastes."

—Star Tribune, Minneapolis-St. Paul

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A Guide to Products for a  
Healthy Planet," this  
December on HBO. Produced  
by Consumer Reports Television  
in association with EDF.

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EDF Letter

Deborah Bellini  
2322 5th St. #201  
Santa Monica, CA 90405

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

23 1990

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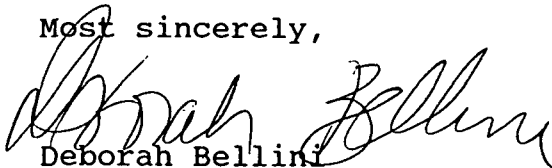
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Most sincerely,

  
Deborah Bellini

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EPA

CORP. CONTROL

39682

90NOV 8 P1:14

618 W. Brockett  
 Sherman TX 75090  
 November 3, 1990

Mr. William K. Reilly  
 Administrator  
 Environmental Protection Agency  
 Washington DC 20460

Dear Mr. Reilly:

Please say no to Ethyl Corporation's request for approval of MMT as a gasoline additive. We cannot afford to repeat the disaster of lead in the environment by emitting another toxic metal whose long-term effects are unknown ~~by~~ but rather predictable. There are other ways to reduce automobile emissions not the least of which is to reduce miles driven by developing mass transit alternatives.

Thank you for consideration of this letter.

Sincerely yours,  
 Cynthia Manley  
 (an EDF member)

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P.95  
WILLIAM K. KELLY  
ADMINISTRATOR  
U.S.E.P.A.

Mr. Mr. Kelly -

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Cthyl Corporation's application for "Hi-Tek 3000", a TOXIC MANGANESE-BASED gasoline additive. Our atmosphere is in bad enough shape as it is. and, we still don't have a cure for cancer!

Thank you very much!

Robert J. Porter

ROBERT J. PORTER

NOV 8 1980

34650

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EPA

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**American Massage Therapy Association, Incorporated**

**Paul D. Tuff**  
Sports Massage Therapist  
Registered Massage Therapist  
P.O. Box 1218  
Carmel Valley, CA 93924  
(408) 659-3188

Dear Mr. Kelly

I strongly urge you to REJECT the Ethyl Corporation's application to use MMT as an octane-enhancing gasoline additive. We cannot afford to repeat the public health catastrophe associated with the use of lead as a gasoline additive. Please suspend all currently permitted use of manganese as a gasoline additive in the United States.

Sincerely

Paul D. Tuff

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69466  
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November 3, 1990

Dear Mr. Reilly,

I'm writing to urge you to deny the addition of MMT to gasoline. The research data on manganese is relatively sparse. With the already existing atmospheric problems it would seem wise to move slowly and carefully before randomly introducing another element into our environment.

Sincerely,

Robin Lillyreed

47 Bayview Ave

Port Washington, N.Y.

11050

P.S. Please set your sights more upon supporting an appropriate hydrogen fuel.

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